

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

In re:
A+ PRO RECOVERY AND TOWING LLC
Debtor.
§
§ Chapter 7
§
§ Case No. 22-10132
§

TRUSTEE'S NOTICE OF INTENT TO CONDUCT A RULE 2004 EXAMINATION

To: Castine McIlHargey, 2216 Padre Blvd, Ste B 158, South Padre Island, TX 78597-0204

PLEASE TAKE NOTICE that Catherine Curtis (the “Trustee”), the chapter 7 trustee for the estate of A+ Pro Recovery and Towing LLC (the “Debtor”), files this *Notice of Intent to Conduct a Rule 2004 Examination* (the “Notice”).

PLEASE TAKE FURTHER NOTICE this Notice was filed on February 20, 2023 and that per Fed. R. Bankr. P. 2004 and the Southern District of Texas’ Local Bankruptcy Rule 2004-1, 14-days’ notice must be given to A+ Pro Companies, LLC.

PLEASE TAKE FURTHER NOTICE that Castine McIlhargey is to direct its response to Trustee’s counsel, J. Maxwell Beatty, The Beatty Law Firm PC, at 1127 Eldridge Pkwy, Suite 300 #383, Houston, Texas 77077 or via email at max@beattypc.com.

PLEASE TAKE FURTHER NOTICE if Castine McIlhargey does not serve a response, then the notice to conduct an examination is deemed ordered without require the entry of an order by the Court.

PLEASE TAKE FURTHER NOTICE that after the 14-day notice period, the Trustee will serve **Exhibit 1** upon Castine McIlhargey seeking the production of certain documents identified in **Exhibit 1**.

Date: February 20, 2023

THE BEATTY LAW FIRM PC

By: /s/J. Maxwell Beatty _____
J. Maxwell Beatty
State Bar No. 24051740
max@beattypc.com
1127 Eldridge Pkwy
Suite 300, #383
Houston, Texas 77077
Tel. 832-529-3381
Fax. 832-852-1266
Counsel for the Chapter 7 Trustee

CERTIFICATE OF CONFERENCE

I certify that, on February 15, 2023, I attempted to confer with Castine McIlhargey regarding a reasonable examination schedule, including the dates for production, by sending an email to all known email addresses for her. Ms. McIlhargey did not respond.

/s/ J. Maxwell Beatty _____
J. Maxwell Beatty

CERTIFICATE OF SERVICE

I certify that, on February 20, 2023, a true and correct copy of this *Notice of Intent to Conduct a Rule 2004 Examination* was served upon all parties who have requested electronic notice through the Court's ECF system. In addition, a copy was served via U.S. Mail and via email as follows:

Castine McIlHargey
2216 Padre Blvd, Ste B 158
South Padre Island, TX 78597-0204
castine@spi-tow.com
castine.mcintyre@gmail.com

/s/ J. Maxwell Beatty _____
J. Maxwell Beatty